

FILED
DISTRICT COURT OF GUAM
SEP 15 2006 *hbw*
MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

Defendant.

Case 1:05-cr-00053 Document 311 Filed 09/15/2006 Page 1 of 2

ORIGINAL

1 including today. However, Judge Sukola has also indicated that even though the jury trial selection
2 will begin on September 25, 2006, there will be a recess in the trial between October 6, 2006 and
3 October 26, 2006 because she will be off-island.

4 3. In addition, the undersigned counsel has also learned this week that one of the
5 witnesses for Jonathan Canovas' sentencing hearing, Mrs. Rosemarie A. Camacho, who has been
6 providing psychological counseling services to him will not be available for the September 20, 2006
7 sentencing date because she is presently on maternity leave until the first week of October 2006.

8 4. The aforementioned circumstances make it extremely difficult to provide effective
9 representation for Mr. Canovas or my client in the local murder case.

10 5. The undersigned counsel did contact Assistant U.S. Attorney Karon V. Johnson
11 today on September 15, 2006, who related that she has no objection to continuing the sentencing date
12 for Mr. Jonathan E. Canovas' cases.

13 Therefore, based on the forgoing, the undersigned counsel is respectfully requesting
14 for an order to continue the sentencing date from September 20, 2006 to October 10, 2006 or
15 thereafter.

16 Respectfully submitted this 15th day of September, 2006.

17 ALTERNATE PUBLIC DEFENDER:

Attorneys for Defendant Jonathan E. Canovas

18
19 PHILLIP J. YONGCO
20
21
22